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6 *Attorneys for Plaintiff, ABBEY DENTAL CENTER, INC.*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9  
10 ABBEY DENTAL CENTER, INC., a Nevada ) Case No. 2:15-cv-02069-GMN-PAL  
11 Corporation, )  
12 Plaintiff, ) **STIPULATION AND (PROPOSED)**  
13 vs. ) **ORDER TO STAY PROCEEDINGS**  
14 CONSUMER OPINION LLC, a Nevada ) **(4th Request)**  
15 Limited liability company; DOES 1-10; and )  
16 ROE ENTITIES 1-10, inclusive, )  
17 Defendant(s). )  
18 )  
19 )  
20 )  
21 )  
22 )  
23 )

Plaintiff, ABBEY DENTAL CENTER, INC., and Defendant, CONSUMER OPINION LLC, by and through their respective, undersigned counsel, do hereby stipulate and agree as follows:

1. The aforesaid parties are currently actively engaged in settlement negotiations in regards to the instant matter.
2. On January 6, 2016, the parties stipulated to stay the proceedings in this matter

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1 for thirty (30) days, in order to allow the parties to facilitate settlement.

2       3. The Court entered the parties' stipulation as an Order on January 14, 2016.

3       4. The Court's Order was due to expire on February 5, 2016.

4       5. Due to continuing settlement discussion, the parties stipulated to stay the matter  
5 for a second time on February 3, 2016.

6       6. The Court entered the parties' second stipulation as an Order on February 9,  
7 2016.

8       7. Due to continuing settlement discussion, the parties stipulated to stay the matter  
9 for a third time on March 3, 2016.

10      8. The Court entered the parties' third stipulation as an Order on April 7, 2016.

11      9. Productive settlement discussions are still ongoing, and accordingly, in an effort  
12 to facilitate those efforts, as well as to minimize attorneys' fees and other legal expenses, the  
13 parties believe that the present civil action should be stayed for an additional thirty (30) days.

14      10. Therefore, the parties agree that the Court may enter the following Order and  
15 request that the Court do so accordingly:

16           a. Except as otherwise provided below, this action shall be stayed for a  
17 period of thirty (30) days from the date this stipulation is filed with the Court.

18           b. The stay shall immediately terminate upon Plaintiff's filing with the  
19 Court, and serving upon Defendant, a notice that Defendant must file an answer to Plaintiff's  
20 complaint in this action or otherwise respond to same in accordance with the *Federal Rules of*  
21 *Civil Procedure* and by no later than twenty-one (21) days after service of the notice.  
22  
23

1           c.     The parties stipulate that nothing in this delay shall be deemed to prejudice  
2 Defendant's right to file an Anti-SLAPP motion, under NRS 41.635 *et. seq.*

3           **SO STIPULATED AND AGREED** on this 7th day of April, 2016.

4  
5           **THE AMIN LAW GROUP, NV., LTD.**

6  
7           **RANDAZZA LEGAL GROUP, PLLC**

8           /s/ Ismail Amin, Esq.

9           ISMAIL AMIN, ESQ.  
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10          *Attorney for Plaintiff*

11           /s/ Marc J. Randazza, Esq.

12           MARC J. RANDAZZA, ESQ.  
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4035 South El Capitan Way  
Las Vegas, Nevada 89147  
Telephone: (702) 420-2001

13          *Attorney for Defendant*

14          **IT IS SO ORDERED.**

15          

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UNITED STATES DISTRICT JUDGE

16          Dated: \_\_\_\_\_

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 7<sup>th</sup> of April, 2016, I served a true and correct copy of:  
**STIPULATION AND (PROPOSED) ORDER TO STAY PROCEEDINGS (4<sup>th</sup> Request),**  
postage fully prepaid and addressed to the following:

serving the following parties via US Mail, postage prepaid;

serving the following parties via CM/ECF;

serving the following parties via facsimile;

serving the following parties via Overnight Express;

Marc J. Randazza, Esq.  
3625 South Town Center Drive  
Las Vegas, NV 89135  
*Attorney for Defendant*

/s/ Teresa Armendariz  
Teresa Armendariz  
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